



IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

TTAB

CITIGROUP INC.

Opposer

v.

EKRAM J. MILLER,

Applicant

Consolidated Opposition No. 91/170037

Serial No. 76/594,596

Serial No. 76/594,597

Serial No. 76/594,599

Commissioner of Trademarks
P.O. Box 1451
Alexandria, Virginia 22313-1451
Attention: Trademark Trial and Appeal Board

ANSWER TO
CONSOLIDATED NOTICE OF OPPOSITION

Honorable Sir:

Applicant, Ekram J. Miller, owner of the marks WORLDLINK, Application
Serial No. 76/594,596; WORLDLINK CENTER, Application Serial No. 76/594,597; and
WORLDLINK CENTER, Application Serial No. 76/594,599 (collectively, "Applicant's
WORLDLINK Marks") as shown in the above-identified applications, hereby submits its
Answer to the Consolidated Notice of Opposition filed on behalf of CITIGROUP, INC.

In response to the Consolidated Notice of Opposition, Applicant states:

06-30-2006

U.S. Patent & TMO/TM Mail Rcpt Dt. #22

1-5. Applicant is without knowledge sufficient to form a belief as to the truth and/or accuracy of the allegations of paragraphs 1-5 of the Consolidated Notice of Opposition and, therefore, denies said allegations and demands strict proof thereof.

6. As to paragraph 6 of the Consolidated Notice of Opposition, Applicant admits that federal trademark registrations for the marks WORLDLINK, Registration No. 1975030; and WORLDLINK, Registration No. 1515736 were issued to Citicorp Corporation, but Applicant is without knowledge to form a belief as to the truth and/or accuracy of the remainder of the allegations in paragraph 6 and, therefore, denies the remainder of the allegations.

7. Applicant admits the allegations of paragraphs 7 and 8 of the Consolidated Notice of Opposition.

9. Applicant denies the allegations of paragraph 9 of the Consolidated Notice of Opposition.

10. Applicant admits that he intends to commence use of its WORLDLINK Marks, but is without knowledge sufficient to form a belief as to the truth and/or accuracy of the remainder of said allegations and, therefore, denies the remainder of said allegations of paragraph 10.

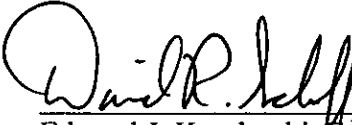
11. Applicant denies that the respective services of Applicant and Opposer are similar, that the respective marks of Applicant and Opposer are identical and that registration of Applicant's WORLDLINK marks would be likely to cause confusion, to cause mistake and to deceive.

Respectfully submitted

MILES & STOCKBRIDGE, PC

Date: _____

6/30/06



Edward J. Kondracki, Esq.
David R. Schaffer, Esq.

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CERTIFICATE OF SERVICE

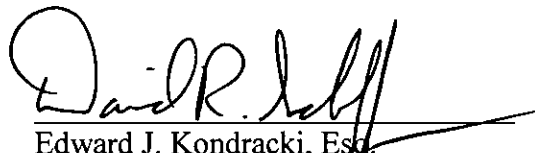
I hereby certify that I have this 30th day of June, 2006 served one copy of the foregoing ANSWER TO CONSOLIDATED NOTICE OF OPPOSITION upon Opposer by mailing the same, first class postage prepaid to Jonathan Moskin, Esq., White & Case LLP, 1155 Avenue of the Americas, New York, New York 10036.

Respectfully submitted

MILES & STOCKBRIDGE, PC

Date: _____

6/30/06


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